

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re Flint Water Cases

No. 5:16-cv-10444-JEL-EAS

HON. JUDITH E. LEVY

MAG. ELIZABETH A. STAFFORD

**DECLARATION OF THEODORE J. LEOPOLD IN SUPPORT OF
CLASS PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF
CLASS SETTLEMENT WITH THE VNA DEFENDANTS**

Pursuant to 28 U.S.C. § 1746, I, Theodore J. Leopold, declare as follows:

1. I am a partner of the law firm Cohen Milstein Sellers & Toll PLLC and I, along with Michael L. Pitt of the law firm Pitt McGehee Palmer Bonanni & Rivers, P.C., serve as Court-appointed Co-Lead Class Counsel in the above captioned matter. I have personal knowledge of the matters stated in this Declaration.

2. Attached as Exhibit A is a true and correct copy of the VNA Settlement Agreement ("VSA") signed by all parties.

3. Attached as Exhibit B is a true and correct copy of the Declaration of Sarah R. London in Support of Class Plaintiffs' Motion for Preliminary Approval of Class Settlement with VNA Defendants.

4. Attached as Exhibit C is a true and correct copy of the Declaration of Dennis C. Reich in Support of Class Plaintiffs' Motion for Preliminary Approval of Class Settlement with VNA Defendants.

5. Attached as Exhibit D is a true and correct copy of the Declaration of Vincent J. Ward in Support of Class Plaintiffs' Motion for Preliminary Approval of Class Settlement with VNA Defendants.

6. Attached as Exhibit E is a true and correct copy of the Declaration of Eric Schacter on Settlement Notice Plan including its two Attachments: Attachment 1, the Long-Form Notice and Claims Package ("Notice Packet"); and Attachment 2, the Summary Notice.

7. Attached as Exhibit F is a true and correct copy of the Proposed Order submitted to the Court.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on April 19, 2024
Palm Beach, Florida

/s/ Theodore J. Leopold
Theodore J. Leopold

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was filed with the U.S. District Court through the ECF filing system and that all parties to the above case were served via the ECF filing system on April 19, 2024.

Dated: April 19, 2024

By: /s/Theodore J. Leopold
Theodore J. Leopold
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